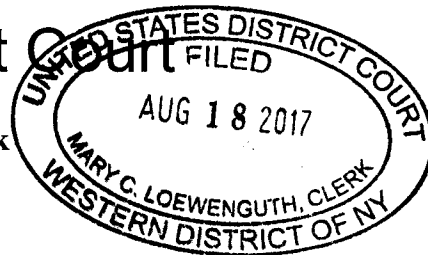


United States District Court

for the
Western District of New York



United States of America

v.

ALIN MADALIN MUNTEANU a/k/a Peter Antal Bakk,

Defendant

17-MJ- 17-mj-4091

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of August 12, 2017 in the county of Monroe in the Western District of New York, the defendant violated 18 U.S.C. § 1543, offenses described as follows:

the defendant did knowingly and willfully make with intent to use, and did use, a false, forged, counterfeited or altered passport, or instrument purporting to be a passport.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☐ Continued on the attached sheet.

Complainant's signature

ANDREW D. WRIGHT, Special Agent
U.S. Department of State, Diplomatic Security Service
Printed name and title

Sworn to before me and signed in my presence.

Date: August 18, 2017

City and State: Rochester, New York

Judge's signature

Hon. Charles J. Siragusa, U.S. District Judge
Printed name and title

17-mj-4091

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF MONROE) SS:
CITY OF ROCHESTER)

Andrew Wright, being duly sworn, deposes and says:

1. I am a Special Agent with the United States Department of State, Diplomatic Security Service, currently assigned to the Buffalo, New York office. I have been employed in this capacity for over fifteen (15) years.

2. As a part of my official duties, I investigate violations of the United States Code as they relate to passport fraud and identity fraud.

3. I make this affidavit in support of a criminal complaint charging Alin Madalin MUNTEANU, a/k/a Peter Antal BAKK, with a violation of Title 18, United States Code, Section 1543, forgery or false use of a passport.

4. The statements contained in this affidavit are based upon my investigation, my personal knowledge, interviews of others, and my review of official documents and records, as well as information communicated to me by other law enforcement agents and government officials. Because this affidavit is being submitted for the purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation.

Instead, I have only included those facts that I believe are needed to establish probable cause that BAKK violated 18 U.S.C. § 1543.

PROBABLE CAUSE

5. On August 12, 2017, at approximately 4:30 P.M., an officer of the Webster Police Department encountered two individuals after a call for suspicious behavior at a Bank of America located at 980 Ridge Rd., Webster, New York.

6. When the Webster PD officer approached the subject and asked for identification, the subject identified himself and presented a Hungarian passport (#BH2844146) bearing the name Peter Antal, BAKK (Date Of Birth: XX/XX/1979).

7. A United States Border Patrol agent from the Rochester Border Patrol Station responded to the location to render assistance and questioned subject about his passport and identity. The subject claimed that the Hungarian passport was his, but stated that he had entered the United States using a Romanian passport in the name Alin Madalin MUNTEANU (Date Of Birth: XX/XX/1981).

8. The Border Patrol Agent used a Mobile Biometric Capture Device to run a fingerprint scan to positively identify subject. The fingerprint scan revealed that subject's fingerprints are a match to the fingerprints that were electronically collected from

MUNTEANU, at the time that he applied for a United States visa at United States Embassy in London, England.

9. A copy of the fingerprints and visa application are stored in the Department of State's visa and passport database. As a result of his application, MUNTEANU, was issued United States Visa No. 20162984650001 in his Romanian passport (#15223787). When questioned by the U.S. Border Patrol Agent about being in possession of a Hungarian passport bearing another name and date of birth, MUNTEANU stated that he has a different name and birthdate because he is Hungarian as well as Romanian.

10. MUNTEANU was also found to be in possession of a Hungarian driver's license bearing the name Peter Antal BAKK. A visual inspection of the driver's license revealed numerous indicators that it was a fraudulent document. The Webster PD subsequently placed MUNTEANU under arrest, and charged him with Criminal Possession of a Forged Instrument 2nd, and Criminal Impersonation 2nd for possession of the fraudulent Hungarian driver's license in violation of New York State law.

11. On August 15, 2017, I was contacted by the Border Patrol and informed about the August 12 incident and arrest of MUNTEANU. I contacted my counterpart, Special Agent Eric DONELAN, at the United States Embassy in Budapest, Hungary. I sent electronic copies of the Hungarian driver's license and the Hungarian passport (#BH2844146) bearing the name Peter Antal, BAKK to DONELAN so that the Government of Hungary

could examine their official records and confirm or deny the authenticity of the Hungarian passport and Hungarian driver's license. I also requested that the Hungarian Government determine if a Hungarian passport had, in fact been, issued to a Peter Antal BAKK.

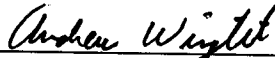
12. On August 16, 2017, I was received an email via DONELAN from the Hungarian National Police, Major Agnes BASSI, assigned to the International Law Enforcement Cooperation Centre in Budapest, Hungary. BASSI states that the Hungarian passport #BH2844146 was issued to Peter Antal BAKK. BASSI further provided the official photograph of BAKK associated with Hungarian passport #BH2844146.

13. A visual examination and comparison of the official photograph for Hungarian passport #BH2844146 with the passport collected from MUNTEANU reveals that the two photographs depict different individuals. BASSI also sent the photograph associated with the Hungarian driver's license for Peter Antal BAKK. A visual examination and comparison of this photograph with the driver's license collected from MUNTEANU likewise reveals that the two photographs depict different individuals.

14. On August 17, 2017, using facial recognition software, I electronically compared the photograph on the Hungarian passport that MUNTEANU provided to Webster PD as his identification against all applications for visas and passports stored in the Department of State's visa and passport database. This search yielded a probable match to

the photograph associated with the U.S. Visa application of Alin Madalin, MUNTEANU (Date Of Birth: XX/XX/1981).

15. Based on the foregoing, I respectfully submit that there is probable cause to believe that Alin Madalin MUNTEAN, a/k/a Peter Antal BAKK, did knowingly and willfully make with intent to use, and did use, a false, forged, counterfeited or altered passport, or instrument purporting to be a passport, in violation of 18 United States Code, Section 1543.



ANDREW D. WRIGHT, Special Agent
US Department of State, Diplomatic Security Service

Sworn to before me this
18 day of August, 2017



HON. CHARLES J. SIRAGUSA
United States District Judge